

Geoffrey M. Drake, *pro hac vice*  
David Mattern, *pro hac vice*  
KING & SPALDING LLP  
1180 Peachtree Street, NE, Suite 1600  
Atlanta, GA 30309  
Telephone: + 1 (404) 572-4600  
Facsimile: + 1 (404) 572-5100  
Email: gdrake@kslaw.com  
dmattern@kslaw.com

*Attorneys for the TikTok Defendants*

*Additional parties and counsel listed on  
signature pages*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR

Honorable Yvonne Gonzalez Rogers

**STIPULATION AND [PROPOSED]  
ORDER MODIFYING SEALING  
DEADLINES IN CONNECTION WITH  
INDIVIDUAL PLAINTIFFS' SECOND  
AMENDED MASTER COMPLAINT  
(DKT. 494) AND LOCAL GOVERNMENT  
AND SCHOOL DISTRICT PLAINTIFFS'  
MASTER COMPLAINT (DKT. 504)**

**STIPULATION**

The Individual Plaintiffs and Defendants TikTok Inc., ByteDance Inc., TikTok Ptd. Ltd., and ByteDance Ltd. (the “TikTok Defendants”) submit this Joint Stipulation and Proposed Order modifying the TikTok Defendants’ deadline to move to seal redacted material in the Individual Plaintiffs’ Second Amended Master Complaint (“SAMC”) (Dkt. 494) and Local Government and School District Plaintiffs’ Master Complaint (“School District Master Complaint”) (Dkt. 504) and stipulate as follows:

WHEREAS, on December 15, 2023, the Individual Plaintiffs filed their SAMC, which withdrew certain Counts and incorporated by reference selected paragraphs from complaints filed (1) by the Attorney General of New Mexico against the Meta Defendants and (2) by the Attorney General of Utah against the TikTok Defendants, portions of which were in turn filed under seal in their respective originating jurisdictions;

WHEREAS, the complaint filed by the Attorney General of Utah includes provisional redactions pursuant to this Court’s Order Setting Sealing Procedures (Dkt. 341);

WHEREAS, on December 18, 2023, the Local Government and School District Plaintiffs filed their Master Complaint;

WHEREAS, the School District Master Complaint includes provisional redactions pursuant to this Court’s Order Setting Sealing Procedures (Dkt. 341), including allegations attributed to the complaint filed by the Attorney General of Utah against the TikTok Defendants;

WHEREAS, under the Order Setting Sealing Procedures, the original deadline for Defendants to file omnibus sealing stipulations and/or motions addressing the redacted material in the complaint filed by the Attorney General of Utah against the TikTok Defendants was December 29, 2023 and, pursuant to the Parties’ stipulation, the Court extended that deadline to January 12, 2024 (Dkt. 515);

WHEREAS, the deadline for Defendants to file an omnibus sealing stipulation and/or motion addressing the redacted material in the School District Master Complaint was January 2, 2023 and, pursuant to the Parties’ stipulation, the Court extended that deadline to January 12, 2024 (Dkt. 515);

WHEREAS, pursuant to the Parties’ stipulation, the Court extended the deadline for Defendants to file an omnibus sealing stipulation and/or motion addressing the redacted material in both the complaint filed by the Attorney General of Utah against the TikTok Defendants and the School District Master

Complaint until January 17, 2024, and further extended the deadline to oppose any motion to seal to January 19, 2024 and the deadline to reply to any opposition to January 23, 2024 (Dkt. 531);

WHEREAS, the Parties are continuing to meet and confer on the TikTok Defendants' motions to seal and redactions to the complaint filed by the Attorney General of Utah against the TikTok Defendants and the School District Master Complaint;

WHEREAS, in light of the Parties' ongoing negotiations, the TikTok Defendants requested and the Individual and Local Government/School District Plaintiffs granted, an extension of the above sealing deadline to January 19, 2024;

WHEREAS, the Parties further agreed that Plaintiffs' deadline to oppose any motion to seal is extended to January 23, 2024, and the TikTok Defendants agreed to forego a written reply (preserving, and not waiving, any reply arguments for any hearing/oral argument on the matter).

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, SUBJECT TO THE COURT'S APPROVAL, THAT: the TikTok Defendants' deadline to file omnibus sealing stipulations and/or motions in connection with the Individual Plaintiffs' Second Amended Master Complaint (Dkt. 494) and Local Government and School District Plaintiffs' Master Complaint (Dkt. 504) is extended to January 19, 2024. The deadline for any opposition thereto is extended to January 23, 2024. The TikTok Defendants will forego a written reply, preserving, and not waiving any reply arguments for any hearing/oral argument on the matter.

**IT IS SO STIPULATED.**

DATED: January 17, 2024

Respectfully submitted,

By: /s/ Lexi J. Hazam

Lexi J. Hazam

LIEFF CABRASER HEIMANN & BERNSTEIN

275 Battery Street, 29<sup>TH</sup> Floor

San Francisco, CA 94111

Telephone: 415-956-1000

lhazam@lchb.com

Christopher A. Seeger  
Christopher L. Ayers  
SEEGER WEISS, LLP  
55 Challenger Road, 6TH Floor  
Ridgefield Park, NJ 07660  
Telephone: 973-639-9100  
Facsimile: 973-679-8656  
cseeger@seegerweiss.com  
cayers@seegerweiss.com

Previn Warren  
MOTLEY RICE LLC  
401 9th Street NW, Suite 630  
Washington, DC 20004  
Telephone: 202-386-9610  
pwarren@motleyrice.com

*Co-Lead Counsel for Plaintiffs*

By: /s/ Geoffrey M. Drake  
Geoffrey M. Drake, *pro hac vice*  
gdrake@kslaw.com  
David Mattern, *pro hac vice*  
dmattern@kslaw.com  
KING & SPALDING LLP  
1180 Peachtree Street, NE, Suite 1600  
Atlanta, GA 30309  
Telephone: + 1 (404) 572-4600  
Facsimile: + 1 (404) 572-5100

*Attorneys for the TikTok Defendants*

By: /s/ Andrea Roberts Pierson  
Andrea Roberts Pierson, *pro hac vice*  
andrea.pierson@faegredrinker.com  
Amy Fiterman, *pro hac vice*  
amy.fiterman@faegredrinker.com  
FAEGRE DRINKER LLP  
300 N. Meridian Street, Suite 2500  
Indianapolis, IN 46204  
Telephone: + 1 (317) 237-0300  
Facsimile: +1 (317) 237-1000

*Attorneys for the TikTok Defendants*

**[PROPOSED] ORDER**

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
Hon. Yvonne Gonzalez Rogers  
United States District Judge

**ATTESTATION**

I, Geoffrey M. Drake, hereby attest, pursuant to N.D. Cal. Civil L.R. 5–1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: January 17, 2024

By: /s/ Geoffrey M. Drake  
Geoffrey M. Drake